



Richman & Richman LLC

Michael P. Richman

122 W Washington Ave Suite 850  
Madison, WI 53703-2732  
608.630.8990  
mrichman@randr.law

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*Via CM/ECF*

Honorable G. Michael Halfenger  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 140  
Milwaukee, WI 53202

RE: In re: Wisconsin & Milwaukee Hotel LLC  
Chapter 11 Case No. 24-21743-gmh

Dear Judge Halfenger:

I am writing on behalf of the Debtor in response to the Court's May 23, 2025 Notice at Doc 552 to report that we are actively engaged in negotiations with other objecting parties of a consensual schedule for discovery and related protocols leading up to the plan confirmation hearings scheduled for the week of July 21.

We have so far reached agreement with the Lenders, and are hopeful of having agreement as well with White Lodging and Marriott. One of our agreements with the Lenders (with which we also hope other parties will agree) is to extend today's deadline (set by Doc 495) for the filing of witness lists and expert reports (with related disclosures) until next Friday, June 6.

In light of the agreement between the Debtor and the Lenders with respect to today's deadline, and because we may not have final agreement of all parties today, I respectfully request that the Court suspend today's deadline pending the submission of a final agreed schedule (which I hope will be by tomorrow, but no later than Friday).

Respectfully,

RICHMAN & RICHMAN LLC

Michael P. Richman  
MPR/hms